

BROWN RUDNICK LLP

Seven Times Square
New York, New York 10036
David J. Molton
212-209-4800

Attorneys for the Foreign Representatives

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:) Chapter 15 Case
)
FAIRFIELD SENTRY LIMITED, et al.,) Case No. 10-13164
) (SMB)
)
Debtors in Foreign Proceedings.) Jointly Administered
)
FAIRFIELD SENTRY LIMITED (IN LIQUIDATION) and)
FAIRFIELD SIGMA LIMITED (IN LIQUIDATION), acting)
by and through the Foreign Representatives thereof, and)
KENNETH KRYS and CHARLOTTE CAULFIELD, solely in)
their capacities as Foreign Representatives and Liquidators) Adv. Pro. No. 10-03635
thereof,) (SMB)
)
Plaintiffs,) NOTICE OF FILING
) OF PROPOSED
-against-) AMENDED
) COMPLAINT
ABN AMRO SCHWEIZ AG a/k/a ABN AMRO)
(SWITZERLAND) AG, ADLER AND CO PRIVATBANK)
AG, ALLIANZBANK SPA/UNIFORTUNE)
CONSERVATIVE SIDE POCKET, ALTERNATIVE)
INVESTMENT STRATEGIES, ARSENAL SPC, ARSENAL)
SPC OBO GLASGOW SEG PORT, BANCA ARNER SA,)
BANCA UNIONE DI CREDITO, BANK HAPOALIM)
SWITZERLAND LTD., BANK JULIUS BAER & CO. LTD.,)
BANK SARASIN & CIE, BANQUE CANTONALE)
VAUDOISE, BANQUE CRAMER & CIE SA, BBVA)
(SUISSE) SA, BCV AMC DEFENSIVE AL FUND, BNP)
PARIBAS (SUISSE) SA, BNP PARIBAS (SUISSE) SA EX)
FORTIS, BNP PARIBAS (SUISSE) SA PRIVATE, BSI AG,)
BSI EX BANCA DEL GOTTARDO, CACEIS BANK)
LUXEMBOURG, CBB (BVI)/ THE ALKIMA FUND, CBT)
GEMS LOW VOL REG, COMPAGNIE BANCAIRE)
HELVETIQUE, CENTRUM BANK AG (AMS), CLARIDEN)
LEU LTD., CORNER BANCA SA, CREDIT SUISSE AG)

ZURICH, DEXIA BANQUE INTERNATIONALE A)
LUXEMBOURG, DRESNER BANK SCHWEIZ, EFG)
BANK SA SWITZERLAND, EFG EUROFINANCIER)
D'INVEST MCL, ENDURANCE ABSOLUTE LTD.)
MASTER, FAIRFIELD INVESTMENT GCI, FAIRFIELD)
INVESTMENT FUND LTD., FALCON PRIVATE BANK,)
FIF ADVANCED LTD., FINTER BANK ZURICH,)
HARMONY CAPITAL FUND LTD., HSBC, IHAG)
HANDELSBANK AG, INCORE BANK AG, KARASEL)
ENHANCED PORTFOLIO, KARLA MULTISTRATEGIES)
LTD., KBC INVESTMENTS LTD., LGT BANK IN)
LIECHTENSTEIN AG, LIECHTENSTEINISCHE LB)
REINVEST AMS, LLOYDS TSB BANK GENEVA,)
LOMBARD ODIER DARIER HENTSCHE & CIE,)
LONGBOAT LTD., MASTER CAPITAL AND HEDGE)
FUND, NATIONAL BANK OF KUWAIT, NBK BANQUE)
PRIVEE SUISSE SA, PICTET & CIE, PKB PRIVATBANK)
AG, PRIVATE SPACE LTD., QUASAR FUNDS SPC a/k/a)
QUASAR FUND SPC CLASS A AND CLASS B CGCNV,)
RBC DEXIA INVESTOR SERVICE JULIUS BAER SICAV,)
RBS COUTTS BANK LTD., RICHOURT AAA)
MULTISTRATEGIES, ROTHSCHILD BANK AG ZURICH)
(DUBLIN) a/k/a ROTHSCHILD BANK AG, ROTHSCHILD)
BANK GENEVA (DUBLIN), ROTHSCHILD LUGANO)
DUBLIN a/k/a BANCA PRIVATA EDMOND DE)
ROTHSCHILD LUGANO S.A., SELLA BANK AG, SIS)
SEEGANINTERSETTLE, SIX SIS LTD., SOCIETE)
GENERALE BANK & TRUST, SOUNDVIEW FUND,)
SWISSCANTO FD CENTRE CLIENTS A/C, T1 GLOBAL)
FUND LTD., UBS AG NEW YORK, UBS AG ZURICH, UBS)
JERSEY NOMINEES, VERWALTUNGS UND PRIVAT-)
BANK AG AKTIENGESELLSCHAFT (AMS),)
VORARLBERGER LANDES UND HYPOTHEKENBANK)
AKTIENGESELLSCHAFT and BENEFICIAL OWNERS OF)
ACCOUNTS HELD IN THE NAME OF CGC NA 1-1000,)
)
Defendants.)
)

PLEASE TAKE NOTICE that Fairfield Sentry Limited (“Sentry”) and Fairfield Sigma Limited (“Sigma”), by and through Kenneth Krys and Charlotte Caulfield (together with their predecessors, the “Foreign Representatives”), and Kenneth Krys and Charlotte Caulfield (together with Sentry and Sigma, the “Plaintiffs”), solely in their capacities as the Liquidators of

Sentry and Sigma and the Foreign Representatives of the liquidation proceedings involving Sentry, Sigma, and Fairfield Lambda Limited pending before the Commercial Division of the Eastern Caribbean High Court of Justice, British Virgin Islands, hereby file the enclosed proposed amended complaint in the above-captioned adversary proceeding (the “Proposed Amended Complaint”).

PLEASE TAKE FURTHER NOTICE that a clean copy of the Proposed Amended Complaint is filed herewith as Exhibit A.

PLEASE TAKE FURTHER NOTICE that a document showing the Proposed Amended Complaint redlined against the operative complaint in the above-captioned adversary proceeding is filed herewith as Exhibit B.

Dated: New York, New York
September 20, 2016

BROWN RUDNICK LLP

By: /s/ David J. Molton
David J. Molton
May Orenstein
Daniel J. Saval

Seven Times Square
New York, New York 10036
Telephone: 212.209.4800
Facsimile: 212.209.4801

Attorneys for the Foreign Representatives